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January 31, 2003

Ms. Linda Combs
Chief Financial Officer
U. S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC20460

Dear Ms. Combs:

On behalf of the National Advisory Council for Environmental Policy and Technology (NACEPT), I am pleased to forward comments and recommendations regarding the Agency's draft 2003-2008 Strategic Plan Architecture. The recommendations were developed by the NACEPT Compliance Assistance Advisory Committee and fully endorsed by the Council.

NACEPT appreciates both the importance of and the complexity in developing a Strategic Plan for EPA. Key highlights of the recommendations are presented below, with more detailed comments discussed in the enclosure. Our comments offer advice on ways the Agency can integrate compliance assistance into its Strategic Plan and to work in partnership with the regulated community and the public, in pursuit of the Agency's goals. Three key recommendations for your consideration are outlined below:

- ❑ Resources for compliance assistance might be better allocated if assistance is more fully integrated into each goal and objective in the Strategic Plan Architecture, and in related resource allocations. The resources required for achieving EPA's goals are not yet identified, available resources almost certainly will not be sufficient to fully achieve the goals, and the Strategic Plan Architecture may not fully support the most efficient use of resources.
- ❑ EPA must rely upon and leverage the resources found in partnerships with others at the federal, state, tribal and local levels, to achieve its goals in the most effective and efficient manner. EPA must always remain mindful of the degree to which achievement of its goals is dependent upon the action of others. The role of all stakeholder communities is particularly important in a time of limited resources.
- ❑ As EPA's Strategic Plan fully matures, the Agency will continue to face new challenges in protecting our nation's environment. EPA must remain both vigilant and flexible; ever scanning the horizon to identify emerging environmental challenges, and swiftly committing itself to address the challenges it identifies.

NACEPT appreciates this opportunity to offer these recommendations and looks forward to assisting the Agency as the Strategic Plan evolves.

Enclosure

Sincerely,

Dorothy Bowers, Chair
National Advisory Council for
Environmental Policy and Technology

**NATIONAL ADVISORY COUNCIL
FOR ENVIRONMENTAL POLICY AND TECHNOLOGY**

**Comments Regarding
U.S. Environmental Protection Agency's
Draft 2003 Strategic Architecture**

January 31, 2003

EXECUTIVE SUMMARY

The National Advisory Council for Environmental Policy and Technology (NACEPT) appreciates the opportunity to provide comments on EPA's draft Strategic Architecture. Comments are organized with a "Background and Overview" followed by comments that address each of the goals. The comments are focused on recommendations for compliance assistance (CA) as it relates to EPA's Strategic Architecture, as well as comments of how the Architecture may impact or limit the ability to use CA in order to achieve its goals and objectives most effectively. The Compliance Assistance Advisory Committee (CAAC), a subcommittee under the auspices of NACEPT, prepared these comments in the belief that they can also assist EPA in developing the more detailed Strategic Plan. The comments for Goal 5 are the most extensive since CA is not addressed in most of the other Goals and Objectives. As general comments for the entire Strategic Architecture the CAAC recommends the following:

- Compliance assistance should be an integral part of the EPA's management strategy and part and parcel to all of the agency's future efforts set forth in its Strategic Plan. More resources should be dedicated to compliance assistance, but not at the expense of enforcement; the best way to do this in the face of resource constraints is for EPA to become more of a wholesaler of environmental information, empowering and leveraging others (states, tribes local governments, and other community-based organizations, etc) to implement compliance assistance programs.
- The Strategic Architecture appears to be based upon existing programs and offices and on EPA's budgeting process. This structure is not conducive to a comprehensive and clear vision of where EPA wants to be in 5 years, or for strategically planning to achieve the desired outcomes. As currently constructed, the Architecture perpetuates EPA's structural barriers to integrated and multi-media approaches and continues a stove piped perspective of how environmental protection should be achieved. EPA should address how they will provide necessary opportunities to develop multi-media strategies that utilize the balanced and complementary interplay of enforcement, monitoring, incentives, innovations, and compliance assistance to meet their goals and objectives and how their resource allocations will support these approaches.
- It is imperative that EPA recognize the diversity of sources that can contribute to stress on the environment, and the importance of information and assistance to effect changes in their environmental performance. In order to achieve its goals and objectives, EPA will need to address not only traditional point sources, but also non-point sources of pollution; not only must large oil refineries and waste management facilities be engaged, but smaller area sources and waste generators, facilities with

stormwater runoff, other businesses and even communities and individuals must also be part of the approach.

- EPA should work with other federal, state, and, local agencies to ensure that compliance assistance is provided for their regulations when compliance with these regulations impacts EPA's ability to achieve its environmental goals and objectives. For instance, state and local environmental regulations and Department of Transportation hazardous materials requirements.
- For each of the five goals, EPA needs to identify the problems, issues, or challenges related to that specific goal in order to place them in perspective; Why is it a goal?; What is needed to address the goal?; and How does the Agency provide the solution? Each goal and the corresponding objectives should be correlated to a range of estimated costs and a realistic schedule for achievement with a process for ranking the importance of the issue so that priority spending achieves the greatest environmental result.
- The Strategic Architecture should explain what financial resources are needed to achieve these goals and where the financial resources will derive. The identification of resources is critically important due to the country's current economic climate and the rapidly diminishing resources for domestic spending in the Federal budget. Without identifying the necessary financial resources and where these resources will come from, EPA's Strategic Plan will not be successful.
- NACEPT has continued to urge EPA to focus on the NACEPT report *The Environmental Future: Emerging Challenges and Opportunities for EPA*. The Architecture should incorporate such trends. For example, the emerging opportunity to reduce mobile source air pollution through the development of a clean automobile engine over the next few years with cleaner fuels being used during the transition to non-polluting engines.
- The lack of specificity in the proposed strategic targets, and "to be determined" indices of performance, hindered our ability to comment on EPA's proposed strategic targets.

BACKGROUND AND OVERVIEW

In July 1999, EPA's Office of the Administrator released the report of the EPA Innovations Task Force, *Aiming for Excellence: Actions to Encourage Stewardship and Accelerate Environmental Progress*. This report marked the culmination of a series of dialogues with affected stakeholders -- representatives from business and communities, state and local government, tribal

representatives, and regional and headquarters EPA staff – to derive insights about specific actions that could be taken “to address environmental problems that have yet to be solved through the current system.”

While the Task Force noted in the report that a wide range of comments and suggested approaches were made in these discussions, it concluded that two uniform themes had emerged:

- EPA needs to do more to help organizations comply with the law.
- EPA needs to encourage those who are willing and able to do more.

The Task Force further noted in the report, “We believe a system that promotes stewardship, in addition to compliance with environmental requirements, has the greatest potential for advancing environmental management capabilities and solving environmental problems.”

In previous recommendations to EPA¹, the CAAC recommended that the Agency’s commitment to CA be reflected in all aspects of the Agency’s strategic planning, from its Mission on down, stating:

“The goals identified by each Program Office should reflect the agency’s commitment to compliance assistance. The objectives relative to each Program Office’s goals should explicitly identify the measurable outcomes that the Program Office intends to achieve with respect to its compliance assistance activities”

The draft Strategic Plan architecture proposes a consolidation of Agency aims into five broad goal statements – four of which are generally programmatic or media specific. The goals architecture seems to be constructed around EPA’s existing organizational structure, which may not support more effective approaches for environmental protection. The CAAC is concerned that the Strategic Plan will not embody a coherent and comprehensive vision of where the agency intends to be in five years (2008). It is concerned that the architecture of the Plan as currently contemplated may unintentionally lock Agency activities into a framework for accounting and resource commitment that is unlinked to the Agency’s vision. Finally, the CAAC is concerned that the Plan is not adequately focused to build upon the findings, recommendations and body of thought yielded from current and past endeavors such as the EPA Innovations Task Force and the CAAC.

To be successful, EPA will need to adopt a broad, holistic approach to environmental assistance to persuade the regulated community and the public to improve their performance by complying with environmental regulations and practicing environmental stewardship. Through indirect leadership activities such

¹ Maximizing Compliance Assistance, National Advisory Council for Environmental Policy and Technology, Compliance Assistance Advisory Committee, August 13, 2001

as compliance assistance, collection and dissemination of information on pollution prevention, and sponsorship of environmental stewardship programs, the agency and its partners will be most successful in engaging and motivating regulated entities and the public to plan and implement actions that support the EPA's goals. In addition, the Agency must educate the regulated community and the public as to the impact their actions have on the environment. Education will enable the regulated community and the public to understand why it is important to initiate stewardship activities, be it in the workplace or in the home.

Strategic Goals and Compliance Assistance Integration.

The EPA Draft Strategic Plan Architecture isolates compliance assistance under Goal Five rather than placing it as a significant component under each of the other four Agency goals. We are concerned that, with this separation, compliance assistance will not be properly and effectively integrated into Agency commitments and practices. The CAAC recommendations to the Administrator have not been effectively incorporated into the Strategic Plan and this may result in impeded integration of compliance assistance and, in turn, unintended outcomes of traditional and less efficient and effective enforcement measures rather than higher aims of environmental performance.

As a related matter, the CAAC is also concerned that this media-specific orientation can impede the development of holistic, cross-media approaches, ultimately resulting in stove piping of approaches and processes, including the prevention of proper integration of compliance assistance into agency-wide planning and programming.

Goals and Measures as Realistic and Achievable Aims

Unlike strategic planning for the private sector and some other public sector entities, EPA's attainment of many of the goals, objectives and sub-objectives in the Strategic Plan is dependent on behavioral changes within the regulated and unregulated communities, and not just within EPA itself. EPA's Strategic Plan architecture does not yet address the activities that EPA intends to undertake on its own, and the activities that it must demand of the regulated and unregulated communities, to achieve these goals, objectives and sub-objectives. Even more importantly, the Architecture addresses neither the costs to be borne by the regulated and unregulated communities in pursuit of EPA's goals nor the procedure to be used in selecting the specific geographic locations to be improved.

Resource Requirements

The attainment of the goals and objectives EPA identifies will require efficient use of limited resources and cooperative efforts. It is not clear how EPA will allocate resources to achieve these goals. In particular, the CAAC is concerned that

there are not enough resources at the state and local level to work with EPA on adequately implementing these goals. Furthermore, state and local priorities and resource allocation issues will affect the degree to which EPA, states, localities, and tribes can effectively collaborate on the implementation of these plans.

Measures that Promote Understanding of the Regulated Community

EPA's ability to achieve sound economic analysis, efficient regulations, sensible enforcement and effective compliance assistance depends, to some extent, on the abilities of its staff to understand the regulated community. EPA can take positive steps to enhance staff understanding of the regulated community – including both large and small entities. While the CAAC is sensitive to staffing and resource constraints, it also believes that EPA staff who write and interpret regulations, plan and conduct enforcement initiatives and are responsible for compliance assistance could better accomplish Agency objectives by becoming more familiar with industry operations and regulatory problems that confront business – including both large and small regulated entities.

GOAL 1: CLEAN AIR

The CAAC applauds EPA's effort to establish measurable goals for clean air. It believes that the accomplishment of these goals will not be an effort undertaken solely by EPA but rather will be addressed in partnership with a wide array of stakeholders. These include state, local and tribal regulators, the current regulated community, networks of compliance assistance providers, the current unregulated community and the general public. In addition, success will entail the use of a wide variety of tools: compliance assistance, pollution prevention, education, communication, and stakeholder involvement.

It is essential that these elements be specifically identified and made integral parts of the various objectives and sub-objectives. It may well be that these issues will be addressed in the full plan but we are concerned at the lack of reference to them in this Architecture. EPA should make a definitive statement that pollution prevention, energy efficiency, technical and compliance assistance and stakeholder involvement are essential elements to the achievement of the objectives of Goal 1.

Specific sub-objectives should be drafted to indicate how the EPA will involve these various constituencies and tools as well as how it will measure their effectiveness. One of the most important elements in CA is developing common understanding of the goals, rules and mechanisms of environmental regulation. In developing the strategic objectives, then, it is important that EPA specifically define terms and avoid ambiguity. An example is found in Objective 1: the use of terms such as "unhealthy" and "air toxics" seems to assume agreement on meaning across stakeholder groups. In reality, there is a divergence of opinion

on these issues. If EPA's progress on these strategies is to be fairly measured, there must be a less ambiguous statement of what is being measured.

GOAL 2: CLEAN AND SAFE WATER

The CAAC concurs with EPA's focusing its water goals on broad outcomes such as access to quality water supplies and basic sanitation, increasing the percentage of aquaculture conducted in quality environments, and increasing the percentage of waters suitable for recreational use. We also concur with EPA that holistically assessing watersheds can be a more effective approach to achieving the Agency's water goals than focusing on individual point source dischargers in isolation. We also agree that EPA's research agenda with regard to improving water science is appropriate, and urge the Agency to pursue improving water science as aggressively as practicable, to provide the best possible tools for watershed management. However, the objectives and sub-objectives under this goal do not plan for or measure CA activities related to this goal.

GOAL 3: PRESERVE AND RESTORE THE LAND

Goal 3 proposes to reduce and control risks posed by releases of harmful substances and proposes to promote waste diversion, recycling and innovative waste management practices. The CAAC recommends that the goal includes promotion of compliance with materials handling and waste management requirements in addition to the promotion of innovative practices and that the Agency utilize CA in this promotion. Materials and waste management practices are fundamental to release prevention, pose far less risk, and are less costly financially and environmentally than release response and remediation. Since pollution prevention is at the top of EPA's waste management hierarchy, pollution prevention should be promoted first, before waste diversion and recycling. We recommend that EPA strengthen the Goal by changing it to read, "Preserve and restore the land by preventing, reducing and controlling risks..."

EPA's ability to preserve and restore the land is also dependent upon compliance with the regulations of other federal, state, and local agencies that address material handling and transport. These include: the Department of Transportation (training, hazmat packaging and transport), OSHA, fire department and building codes (materials handling, containment, emergency equipment, etc.) EPA should engage these entities in partnership activities designed to support the delivery of compliance assistance for these requirements as part of EPA's efforts to reduce and control risks posed by releases of harmful substances. Integration of CA and prevention approaches in this Goal to address dangerous and harmful materials handled in our daily commerce can significantly contribute to reduced risk from releases and improved homeland security.

GOAL 4: HEALTHY COMMUNITIES AND ECOSYSTEMS

We applaud the Agency's commitment to integrated and comprehensive approaches and partnerships referenced in Goal 4. In order to succeed at this holistic approach to environmental improvement, the Agency must ensure the accessibility of reliable, high quality environmental information to both the regulated and unregulated communities, including the general public. To this end, the CAAC recommends that the Agency incorporate into its strategy the need to improve access by the regulated and unregulated communities to compliance assistance related information.

GOAL 5: COMPLIANCE AND ENVIRONMENTAL STEWARDSHIP

General

Goal five is an important recognition that environmental performance can be improved not just through traditional enforcement methods, but also through compliance assistance, innovations, partnerships, and voluntary activities. By making compliance assistance (CA) activities that help regulated entities understand and comply with regulations, prevent pollution, and improve environmental performance a fundamental part of EPA's Strategic Plan, the Agency can help minimize the need for more costly enforcement approaches. Voluntary programs increase goodwill toward the Agency and environmental stewardship through the fostering of win-win situations.

While the CAAC appreciates EPA's commitment to pollution prevention and environmental stewardship, we are concerned that EPA may not consider CA to be a fundamental strategy in achieving Goals 1 through 4. Surely the ultimate goal of providing CA is protection of the nation's health and air, water and land resources. Therefore, it is recommended that CA activities be integrated into the objectives identified in Goals 1 through 4 and that EPA's provision of CA be included in the Agency's measurement approach for assessing progress toward achieving those goals.

The objective of Goal 5 should be an integration of all aspects of the agency's compliance and environmental stewardship activities into a mutually supportive system. Critical success factors might include improved environmental performance in the regulated community, enhanced protection of human health and the environment, and an increase in the use of environmental management systems as a result of the agency's actions. The objectives developed to support this goal should define how the EPA will carry out its commitment to compliance assistance, pollution prevention, and environmental stewardship. This should

also include other objectives the agency must carry out to fulfill its regulatory enforcement and compliance incentives commitments.

Review of the current draft Architecture indicates that EPA's Strategic Plan has not incorporated the CAAC recommendation that the goals of each program office should reflect the Agency's commitment to compliance assistance. Failure to integrate CA into all of the Agency's Goals will likely result in over-reliance on enforcement instead of the win-win scenarios engendered by a fully integrated program of CA, voluntary programs, and partnerships. CA can provide a more economical approach to federal environmental investments with greater environmental and economic benefits than reliance on facility-by-facility enforcement driven corrective actions.

To be successful, EPA will need to adopt a broad, holistic approach to environmental assistance that works to persuade the regulated community and the public to improve its performance by complying with environmental regulations and practicing environmental stewardship. Through indirect leadership activities such as compliance assistance, collection and dissemination of information on pollution prevention, and sponsorship of environmental stewardship programs, the Agency and its partners will be most successful in engaging and motivating regulated entities and the public to plan and implement supporting actions that support the EPA's goals. In addition, the Agency must educate the regulated community and the public as to the impact their actions have on the environment. Education will enable the regulated community and the public to understand why it is important to initiate stewardship activities, be it in the workplace or in the home.

A primary intent of Goal 5 as presently drafted is to measure reductions of pollutants as related to compliance with regulations or as a result of compliance assistance efforts. Because some regulations do not have a direct relationship with reducing pollution generation, EPA should be cautious about relying solely on decreased pollution generation as a measure of regulatory comprehension and compliance. The outcomes measures selected for each objective should be consistent with the procedures outlined in EPA's Guide for Measuring Compliance Assistance Outcomes manual and should measure changes in awareness and understanding, changes in behavior, and environmental and human health improvements.

EPA should continue to address the issue of how to balance the allocation of resources between enforcement and compliance assistance; both types of activities are needed and must continue. In specific comments provided elsewhere, the CAAC suggests that more resources be applied to compliance assistance. We are concerned that the Agency does not appear to have adequate resources to achieve all of the proposed goals using an effective mix of CA and enforcement. In particular, there are not enough resources at the state and local level to work with EPA on adequately implementing these goals.

Furthermore, state and local priorities and resource allocation issues will affect the degree to which EPA, states, localities, and tribes can effectively collaborate on the implementation of these plans.

Lastly, EPA should be cautious about assuming a direct and causal relationship between the amount of funding for environmental management activities and the magnitude of pollution reduction.

II. Specific Comments

A. Objective 1

This objective proposes to maximize compliance by achieving an X% increase in the pounds of pollution reduced through a combination of compliance activities--assistance, incentives and enforcement. Regulated entities' comprehension of environmental requirements is a pre-requisite to all methods of improving compliance. Therefore, the first objective of compliance assistance should be to enable regulated entities to understand both the regulations that apply and how to comply with them.

1. Sub-Objective 1.1

The first goal of compliance assistance should be to enable regulated entities to understand the regulations and how to comply with them. Additionally, providing entities with an understanding of why compliance is important is often an effective motivator for improved compliance. Therefore, the primary strategic objectives for CA should be to maximize the number of entities receiving CA and using the information to comply with environmental requirements. Additional benefits of CA are significant and include improved environmental management practices and the potential reduction in pollution generated. These should be secondary targets for this objective.

An effective CA delivery network needs to encompass a variety of CA providers and delivery methods. Ideally, EPA's assessment of the effectiveness of CA should include CA provided by other agencies and organizations that are included and supported in EPA's CA network. EPA's CA centers are an important contribution to CA but they remain a single delivery tool.

2. Sub-Objective 1.2

As currently structured this sub-objective does not measure the number of facilities conducting environmental audits or the number

of facilities that are encouraged to perform audits as a result of EPA's audit policy. Instead it measures the number of facilities reporting violations under the audit policy. Thus to satisfy this sub-objective, there must be an increased amount of non-compliance by facilities performing audits. EPA should assess ways to measure the increase in number of facilities conducting environmental audits as a method of environmental stewardship.

3. Sub-Objective 1.3

This sub-objective should be clarified as to the role of enforcement in achieving the agency's goals in the areas of pollution reductions and environmental stewardship. It appears to some as though EPA is suggesting that more enforcement actions are needed in order to meet the numerical targets established in this sub-objective. If, in reality, EPA is seeking to focus its enforcement efforts to obtain more environmental benefit from them, this needs to be stated more clearly so that CAAC members and the public understand what the Agency is trying to achieve.

B. Objective 2

EPA should clarify how the value for "X lbs of pollution" will be related to human health and environmental risks.

1. Sub-Objective 2.1

EPA's sub-objective references government "at all levels" yet sets strategic targets that appear to address only Federal facilities. This sub-objective should also seek to engage EPA in working with other Federal programs and agencies to involve their programs that interact with regulated entities in supporting CA objectives. These programs include but are not limited to SBA, DOT, DOL, USDA, BLM, NIST, DOE, SEC, etc.

The goals for compliance and environmental performance at government facilities discussed in this objective are different in scope and detail from the strategic targets for businesses discussed in the next subjective. Government facilities can and should serve as a model to private industry. EPA should establish goals and objectives for government facilities that are as similar as possible to those for other regulated entities.

2. Sub-Objective 2.2

The second, third and fourth strategic targets discuss reductions of various measures reported under the Toxic Release Inventory (TRI). EPA should clarify its intentions regarding the reductions in “business-reported wastes,” “chemicals reported by business to TRI as released to the environment,” and “hazardous waste generated by businesses.” Under EPA’s current TRI reporting, wastes that are recycled, transferred to waste management facilities and publicly owned treatment works (POTWs), or simply released to the environment, are all lumped together. As currently written, it is unclear exactly what would be measured under the proposed sub-objective. EPA should focus on increasing the recycling and/or proper handling of materials, while decreasing materials released to the environment.

The tenth strategic target discusses a reduction of “X million gallons of waste pollution.” The term “waste pollution” is confusing. From a pollution prevention perspective, any material not reused in a process is considered waste, whether or not it contains any particular pollutants.

The eleventh strategic target proposes to reduce by X tons air pollution prevented. This target would result in a decrease in air pollution prevention and an increase in pollution. EPA should clarify this strategic target.

The twelfth strategic target states that “X” millions of lbs. of hazardous chemicals and XX millions of gallons of “hazardous solvents” will be reduced. It is not clear if the reduction to be measured will be a reduction in lbs. manufactured, imported, used, or disposed of.

3. Sub-Objective 2.3

This sub-objective recognizes the important fact that much of the pollution in this country comes not from industrial point sources but through the day to day actions of the public. Purchasing decisions by consumers have further environmental consequences as these decisions, in the aggregate, affect businesses environmental and production decisions.

While education of the public is an admirable strategic target, this sub-objective is not ambitious enough. As written, the only measurement of this objective is in terms of activities, not impacts. The Agency should include measurements of success in raising the public’s awareness, knowledge, understanding, positive perception, etc. Specific targets for reduction in non-point pollution to the air,

water, and land should be provided in much the same way that they were provided for businesses in sub-objectives 2.1 and 2.2.

EPA should also recognize and plan to utilize the synergy that exists between sub-objectives 2.2 and 2.3. All businesses' employees are part of the people discussed in this sub-objective.

C. Objective 3

1. Sub-Objective 3.1

It is unclear why assistance to small businesses is addressed separately in this Objective rather than included in Objective 1.

The first strategic target must better define "reaching" and the level of contact it is meant to suggest. Furthermore, the Agency should go beyond the mere measure of contact to measure the environmental impact of the contact. The 50 state and three territorial SBAPs noted in Sub-Objective 3.1 already reach that number of small businesses annually. The SBAPs are a subset of the many providers that exist in the CA network. The CAAC recommends that EPA collaborate with the broader CA network in their efforts to support outreach and technical assistance.

D. Objective 4

It is recommended that the text for this objective be changed to reflect that the agency's goal is to work with tribal governments to protect tribal human health and environment. This objective should explicitly recognize the authority of the tribal governments and identify tribal governments in EPA's goal as a collaborating partner.

E. Objective 5

1. Sub-Objective 5.1

Given the level of funding and mission of the Department of Energy (DOE) and the EPA, it is recommended that EPA collaborate with the DOE on research into energy production processes be left to DOE so that EPA's limited resources can be devoted to important environmental compliance, assistance, and protection efforts (second strategic target).

EPA should ensure that the environmental technology discussed in the third strategic target includes in-process pollution prevention technology and not just end-of-pipe technology more commonly promoted under the term 'environmental technology.'

2. Sub-Objective 5.2

The third strategic target is very important and should be given a high priority. Many of the issues under deliberation by the CAAC include how EPA can effectively garner and incorporate feedback from regional, state, and local CA providers and enforcement personnel. With this mechanism, the Agency will be able to effectively evaluate the clarity, enforceability and effectiveness of the rules and regulations it promulgates. Evaluation of clarity, enforceability and effectiveness will allow the agency to promulgate regulations that are clear and as close to self-enforcing as possible.

F. Objective 6

The CAAC supports the EPA's goal of ensuring that decisions rely on sound economic and policy analysis, consider alternatives, incorporate statutory and executive priorities, and are supported by a well-managed and inclusive development process.

1. Sub-Objective 6.1:

The CAAC supports this sub-objective to improve the Agency's regulatory and non-regulatory decisions through the development of sound economic analysis. It is recommended that the Agency's economic analysis recognize and estimate the costs of decision-making needed for firms to comply with regulations. Identifying those costs may in some cases lead to recognition of the importance of CA in reducing the compliance costs of regulated entities.